

REMARKS

Upon entry of the present amendments, claims 1-21 and 23-34, and 36-53, and 55-91 will be pending in the subject application. Claims 1, 3-7, 9, 10, 15-17, 21, 25-28, 30-34, 36-43, 49, 50, 55, 57, 65, 70-72, 74, 76, 77, 79-81, 83, 85, 86, 88, 89, and 91 have been amended, claims 10-16, 25-29, 42, 44-50, and 55-78 have been withdrawn, and claims 38-41 have been cancelled as shown on pages 2-16 of the Reply. Claims 22, 35 and 54 were cancelled previously. No new matter has been added.

Assignee's representative thanks Examiner Pham for the courtesies extended during the telephonic interview conducted on June 22, 2012, during which a set of proposed amendments were discussed. Assignee's representative provided an overview of the amended claims and indicated support in the specification for the amendments. The Examiner recommended minor alterations to the amendments, and indicated that the claims overcome the currently cited art references. Although no immediate agreement was reached regarding allowability of the claims, the Examiner indicated that a new search would be performed on the amended claims in light of the discussion.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 7, 9, 30-34, 36, and 37 under 35 U.S.C § 101

Claims 7, 9, 30-34, 36, and 37 are rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Withdrawal of this rejection is respectfully requested in view of the amendments to claims 7, 9, 30-34, 36, and 37 herein, which are believed to clearly place the subject claims within the bounds of statutory subject matter pursuant to 35 U.S.C. § 101. In this regard, the addition of the term "non-transitory" herein to claims 30-34, 36, and 37 is to be understood to have removed only propagating transitory signals per se from the claim scope and does not relinquish rights to all standard computer-readable media that are not only propagating transitory signals per se. In other words, the meaning of "non-transitory" computer-readable medium should be construed to exclude only those types of transitory computer-readable media, which are found in *In re Nuijten*, to fall outside the scope of patentable subject matter under 35 U.S.C. § 101

II. Rejection of Claims 1-9, 17-21, 23, 34, 30-34, 36, 37, 43, 51-53, and 79-82 under 35 U.S.C § 103

Claims 1-9, 17-24, 30-37, 43, 51-54, and 79-82 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Farrell, *et al.* (US 7,717,841) in view of Yaksich, *et al.* (US 5,563,999). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all elements set forth in the subject claims.

To reject claims in an application under § 103, an examiner must establish a prima facie case of obviousness. A prima facie case of obviousness is established by a showing of three basic criteria. First, there must be some apparent reason to combine the known elements in the fashion claimed by the patent at issue (*e.g.*, in the references themselves, interrelated teachings of multiple patents, the effects of demands known to the design community or present in the marketplace, or in the knowledge generally available to one of ordinary skill in the art). To facilitate review, this analysis should be made explicit. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 706.02(j). See also KSR Int'l Co. v. Teleflex, Inc., 550 U.S. 398, 04-1350, slip op. at 14 (2007). The reasonable expectation of success must be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Amended independent claim 1 recites, *a processor configured to: **receive first input that selects a sales packet, from a set of available sales packets, to be printed, and second input that selects an event from a set of events relating to activity in a sales management data store, wherein the set of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status; and storage configured to store an event rule that relates the event and the sales packet, wherein the processor is configured to **generate a print order for the sales packet in response a determination that the event has occurred.*****

Farrell, *et al.* does not disclose or suggest at least these aspects. Farrell, *et al.* relates to a job processing method that allows an operator of an electronic reprographic system to select deferred actions for inactive print jobs which are automatically initiated upon the detection of a specific triggering event (see Farrell, *et al.*, Abstract). Farrell, *et al.*'s system includes a means

for storing an inactive print job, means for entering a job processing instruction or set of instructions associated with the inactive print job for use at a future time, and means for automatically triggering access of the inactive print job and the job processing instructions associated with the inactive print job. According to Farrell, *et al.*, the triggering means is typically one of a predetermined set of system operating conditions (see Farrell, *et al.*, column 2, lines 45-60).

However, Farrell, *et al.* is silent at least with regard to a processor configured to receive *second input that selects an event from a set of events relating to activity in a sales management data store, wherein the set of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status*, or that *generates a print order for a sales packet in response to occurrence of the event*. With regard to selection of events in general, the Office Action indicates in particular Farrell, *et al.*'s trigger events, described at columns 6-10 of the cited reference. However, describing these triggering events at column 6, lines 45-54, Farrell, *et al.* states:

“When these triggering events occur, the automatic action specified by the operator will be performed. Some examples of triggering events include, for example: *date and time (specified in relative or absolute terms); resource availability (i.e., availability of resources such as, for example, print queues, cartridge tape drives, modems, file servers, finishing devices, fonts, etc.); operator logoff; operator logon; receipt or creation of a specified second print job; system transition to a quiescent state; etc.*” (emphasis added)

These indicated triggering events do not include *events relating to activity in a sales management data store, wherein the events include addition of a new sales contact, a change of an existing sales contact to a first status, or a change of the existing contact to a second status*. More specifically, Farrell, *et al.* does not include capability to receive *second input that selects an event from a set of events relating to activity in a sales management data store, wherein the set of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status*. Consequently, Farrell, *et al.* also fails to disclose or suggest *generating a print order for a sales packet in response to*

occurrence of such an event.

Yaksich, *et al.* is also silent regarding at least these aspects. Yaksich, *et al.* relates to a forms automation system in which a central library facility functions as a central repository for business forms in electronic format. According to Yaksich, *et al.*, these forms are distributed to specified use locations by the central library depending upon the needs of the various use locations (see Yaksich, *et al.*, Abstract).

In the Response to Arguments section of the Office Action, the Examiner asserts that Yaksich, *et al.* discloses printing of sales packets when new accounts are established or changes are made to existing accounts, noting in particular column 69, line 60 – column 70, line 8 of that reference, which states:

The forms automation system 10 in this particular example is used to automate the ultimate customer interview process that occurs when new accounts are established at a banking institution, or changes are made to existing accounts. The exact detail of the processing performed during the customer (bank's) interview will determine the forms which are to be printed. For example, opening of checking accounts, time deposit accounts, and savings accounts will generate different forms that are ultimately printed. In addition to printing the electronic forms, the forms automation system 10 according to the invention will produce a check list of all forms printed as a result of specific activity on an account, and all forms required to document an interview will be printed immediately at the completion of the interview process so that the bank's customer will have – before he or she leaves the bank – a paper form. Three to five bank customer interviews can take place concurrently and the common data for each will automatically be transferred from one electronic form to the other.” (Yaksich, *et al.*, column 69, line 60 – column 70, line 8)

The Office Action equates the establishment of new accounts or changes made to existing accounts, as described in Yaksich, *et al.*, with the events of independent claim 1. However, Yaksich, *et al.*'s system does not include a *set of events* that includes at least *addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing*

contact to a second status, nor does Yaksich, *et al.* include the capability to receive second input that selects an event from such a set of events. In these regards, Yaksich, *et al.* does not describe generally how associations are created between an event and a sales packet (or between an event and the forms to be printed according to Yaksich, *et al.*'s system). The cited reference therefore fails to disclose or suggest the particular technique set forth in amended independent claim 1, comprising **receiving first input that selects a sales packet, from a set of available sales packets, to be printed, and second input that selects an event from a set of events relating to activity in a sales management data store, wherein the set of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status.**

Similarly, amended independent claim 7 recites, *selecting, from a plurality of available sales packets via a first display region, by a system including a processor, a sales packet that contains information from a sales management data store; selecting, from a plurality of events via a second display region an event relating to a change in the sales management data store, wherein the plurality of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing sales contact to a second status; and generating a print order for the sales packet in response to detecting an occurrence of the event.* As discussed *supra*, Farrell, *et al.* and Yaksich, *et al.* do not disclose or suggest at least these aspects.

Likewise, amended independent claim 9 recites, *facilitate render of a first display region configured to display a menu of available sales packets and receive a selection of a sales packet, from the menu of available sales packets, to be printed; facilitate render of a second display region configured to display a menu of events for occurrence in a sales management data store and receive selection of an event from the menu of events, wherein the menu of events includes addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing sales contact to a second status, and in response a determination that the event has occurred, generate a print order for the sales packet.* The cited references are silent at least with regard to these aspects, as noted above.

Also, amended independent claim 17 recites, **displaying a plurality of events relating to respective changes in a sales management data store, the plurality of events including addition of a new sales contact, a change of an existing sales contact to a first status, and a change of**

the existing contact to a second status; receiving a selection of an event from the plurality of events, amended independent claim 30 recites, displaying a set of events that define respective changes in a sales management data store, the set of events including addition of a new sales contact, a change of an existing contact to a first status, and a change of an existing contact to a second status; receiving a selection of an event of the set of events, and amended independent claim 43 recites, a display comprising: a first display region configured to display a plurality of sales brochures to be printed, and a second display region configured to display a plurality of events associated with respective changes in a sales management data store, the plurality of events including a new sales contact added to the sales management data store, a change of an existing sales contact to a first status, and a change of the existing contact to a second status. Neither Farrell, *et al.* nor Yaksich, *et al.* disclose or suggest at least these aspects, as discussed above.

Furthermore, amended claim 3 recites, *the processor is further configured to receive third input that specifies whether an output of the print order is to be sent to an address associated with at least one of a salesperson, the new sales contact, or the existing sales contact.* Farrell, *et al.* does not disclose or suggest such third input. In this regard, it is noted that Farrell, *et al.* deals with deferment of inactive *print jobs*, not with generation of *print orders*. As such, Farrell, *et al.*'s print jobs are either archived, deleted, or sent to the print queue (see, e.g., Farrell, *et al.*, column 2, lines 33-38), and there is no mechanism described in Farrell, *et al.* for specifying whether an output of a print order is to be sent to a salesperson, a new sales contact, or an existing sales contact. Yaksich, *et al.* does not make up these shortcomings.

In view of at least the foregoing, it is respectfully submitted that Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all aspects set forth in amended independent claims 1, 7, 9, 17, 30, and 43 (and all claims depending there from), and as such fail to render obvious the present application. It is therefore requested that this rejection be withdrawn.

III. Rejection of Claims 83-91 under 35 U.S.C § 103

Claims 83-91 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Farrell, *et al.* in view of Yaksich, *et al.*, and further in view of Sevcik, *et al.* (US 6,330,542). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons.

Farrell, *et al.*, Yaksich, *et al.*, and Sevcik, *et al.*, individually or in combination, do not disclose or suggest all aspects of the subject claims.

Amended claim 83 recites, *the processor is further configured to send the print order to a printing vendor in response to the determination that the event has occurred.* As conceded in the Office Action, Farrell, *et al.* and Yaksich, *et al.* are silent with regard to sending a print order to a printing vendor. Those cited references therefore fail to disclose or suggest, more particularly, sending a print order to a printing vendor in response to occurrence of the event set forth in amended independent claim 1 (from which amended claim 83 depends).

Sevcik, *et al.* does not cure these deficiencies. Sevcik, *et al.* relates to a system for managing the quoting and procurement of commercial printing that provides the printing buyer with an immediate quote (see Sevcik, *et al.*, column 2, lines 44-50). According to Sevcik, *et al.*, a print buyer selects an item, turnaround time, and variable information. The system then searches a database to find all vendors that have indicated being able to supply the item in the specified turnaround time and finds the ones closest to the delivery zip code. The system then searches for the lowest price for that quantity range and variable options among the vendors that have been identified. The system then displays the vendor with the most competitive printing and freight cost and assigns a reference number to the quote (see Sevcik, *et al.*, column 9, lines 26-50).

The Office Action asserts that Sevcik, *et al.* discloses in general sending a print order to a printing vendor. However, like Farrell, *et al.* and Yaksich, *et al.*, Sevcik, *et al.* does not indicate that a print order is sent to a print vendor *in response to the occurrence of the event* selected according to the techniques set forth in independent claim 1. Instead, Sevcik, *et al.*'s system only submits print orders in response to manual submission of a print order by a user. See, for example, column 13, lines 27-34 of Sevcik, *et al.*, which states:

“After the print buyer receives the price and specifications, the print buyer may either proceed to order the product or if the price is more than the buyer’s budget, the buyer has the option of entering the maximum price the buyer would like to pay for the project and allowing the system to generate a new quote...” (Sevcik, *et al.*, column 13, lines 27-34) (emphasis added)

None of Farrell, *et al.*, Yaksich, *et al.*, or Sevcik, *et al.* disclose or suggest sending the print order to a printing vendor *in response to occurrence of an event*, where the event is an *event from a menu of events relating to activity in a sales management data store, wherein the menu of events include at least addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status.*

Similarly, amended claim 86 recites, *transmitting the print order to a printing vendor in response to the detecting occurrence of the event*, and amended claim 89 recites, *sending the print order to a printing vendor in response to the detecting the occurrence of the event*. As discussed above, the cited references are silent regarding at least these aspects.

Also, claims 83-85 depend from amended independent claim 1, claims 86-88 depend from amended independent claim 7, and claims 89-91 depend from amended independent claim 17. As discussed *supra* in connection with those independent claims, neither Farrell, *et al.* nor Yaksich, *et al.* disclose or suggest at least ***a processor configured to: receive first input that selects a sales packet, from a set of available sales packets, to be printed, and second input that selects an event from a set of events relating to activity in a sales management data store, wherein the set of events includess addition of a new sales contact, a change of an existing sales contact to a first status, and a change of the existing contact to a second status; and storage configured to store an event rule that relates the event and the sales packet, wherein the processor is configured to generate a print order for the sales packet in response to a determination that the event has occurred.*** Sevcik, *et al.* is also silent regarding at least these aspects.

In view of at least the foregoing, it is respectfully submitted that Farrell, *et al.*, Yaksich, *et al.*, and Sevcik, *et al.*, individually or in combination, do not disclose or suggest all aspects of amended independent claims 1, 7, and 17 (and claims 83-91, which depend there from), and as such fail to make obvious those claims. Withdrawal of this rejection is therefore respectfully requested.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [VIMGP111US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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